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Office vétérinaire fédéral  
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Uffizi federal veterinari

Your ref. Letter dated Oct 12, 2001  
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FSIS  
Office of the Director  
International Policy Division  
Room 4434 South Building  
14<sup>th</sup> Street and Independence Avenue, SW  
Washington DC 20250-3700  
U.S.A.

### On-site audit of Switzerland's meat inspection system/ Draft Final of the Audit Report

Dear Mrs. Stratmoen

Thank you for the draft of the final audit-report, which we received October 22, 2001.

We would like to take the opportunity to address two points, which may have been misunderstood:

1. Testing for Generic E.coli, Page 7:  
This is a program, which the approved establishment is obliged to run. The inspector verifies if the conditions are met with regard to sampling procedures, analytical methods, corrective actions and documentation. The lab has a contract with the establishment.
2. Species Verification Testing, page 9:  
We would like to clarify some details:  
The products eligible for exporting to the United States are pork (ham) and beef (air-dried beef) products. Ham is normally from Switzerland, establishment no. 121 is approved for slaughter and cutting. The carcasses or the cuts are marked with the official health mark. Depending on the size of the cuts they are transported hanging like carcasses or in sealed containers. The meat is accompanied by a health certificate signed by the official inspector. In the receiving processing plant the meat is checked by plant personnel 100%, the inspector monitors the own-checks, additionally he himself checks incoming meat randomly.  
Beef originates from South American sources (US-approved establishments). The cuts are packed in containers, sealed with the health mark and shipping mark. Each piece of meat is vacuum-packed, the film also is marked with the health mark. At the Swiss border every shipment is checked by a Swiss border veterinarian. There is a monitoring program in place to take samples for species testing from all imported meat. The processing establishment receives the original containers. Approved establishments are under continuous supervision. Export production has to be announced to the inspector in advance. In a slaughterhouse there is at least one veterinarian during the whole period of slaughter, in cutting plants and processing establishments there is a daily inspection. Meat of different species is processed separately, by time or by place.
3. Testing- Ready-to-Eat Product for *Listeria monocytogenes* and *Salmonella* species, page 10:  
The Swiss legislation has a lower limit concerning *Listeria monocytogenes* for meat products with a water activity < 0.92 (which is the case for ham and air-dried beef): < 100cfu/g. For *Salmonella* the Swiss standard is the same as yours: for ready-to-eat products: "not detectable in 25 g". We therefore have a special requirement for the US-approved establishments to assure that the products intended for the US meet FSIS-requirements for *Listeria*. They all do monitoring on the finished product, and the method for *Listeria* should be a qualitative one. In case of a positive result, the establishment has to take corrective actions immediately: block the lot the sample has been taken from, start with further investigations. In our Ordinance we have no detailed mandatory procedure. The procedure to withhold the next three lots and test them, is the standard procedure of the Border Veterinary Service.

We take the opportunity to inform you about our discussions with APHIS about their import restrictions put in place February 9, 2001:

These restrictions are still in place. They ban all meat products from European countries, because APHIS sees a risk of commingling of meat from BSE-free countries and meat from BSE-affected countries in the establishments. Additionally APHIS does not allow meat from FMD-affected countries to be processed in Switzerland nevertheless the processing procedure fulfill the requirement for the import of meat products from FMD-affected countries. As a consequence, beef from Brazil and Uruguay is no longer eligible for export production because of FMD, and Swiss beef is not eligible because of BSE. APHIS does not accept our guarantees with regard to non-commingling. APHIS does not accept the evaluation of our inspection system by your Service as sufficient. We have the situation that there has been no export since the beginning of year 2001, and we are afraid, that it will not change very quickly.

Three of the six establishments, which were approved at the time of the audit, have no longer the intention to be US-approved. We therefore withdrew the approval. The establishments are:

Est.No.	Name and address	Slaughter	Cutting	Processing
121	Gehrig AG Thalstr. 35 CH-4710 Klus	•	•	•
293	Rapelli SA Unità produzione Via Lische CH-6855 Stabio			•
324	Rapelli SA, Via Laveggio 13, CH - 6855 Stabio			•

Yours sincerely  
DIVISION PERMITS AND INSPECTIONS  
The Deputy Head:



Dr J. Schluep

cc:

- US Mission Geneva, Office of Agricultural Affairs, fax 022-749 53 33
- Swiss Embassy, Washington